

From: [Kiely, Timothy](#)
To: [Myers, Clayton](#); [Hill, Elizabeth](#); [Jones, Arnet](#)
Subject: FW: Request for an example of seed treatment benefits assessment
Date: Tuesday, April 01, 2014 2:37:19 PM

From: Sonia Roussel [mailto:Sonia.Roussel@hc-sc.gc.ca]
Sent: Tuesday, April 01, 2014 2:32 PM
To: Kiely, Timothy
Subject: Re: Request for an example of seed treatment benefits assessment
Hi Tim,

Sorry for the long delay in getting back to you about sharing efficacy reviews. Between the move in our building and requests to be completed by March 31st, it has been a bit hectic.

I was finally able to get some information about the process. From the response I received, it looks like the process for all US EPA data evaluation records (DERs) requests is to fill in the information below, then it will be forwarded off to you on my behalf. Please note that the turn around time is usually around 30 days.

Active name
Study area (Tox, environment, etc)
Due date
Specific request with MRID #s, if available.

Let me know if you are looking for a specific active or study or if you have any questions.

Sonia

Sonia Roussel
Head, Re-Evaluation and Use Analysis Section | Chef, Section de la réévaluation et de l'analyse de l'usage
Value Assessment and Re-Evaluation Management Directorate | Direction de l'évaluation de la valeur et de la gestion des réévaluations
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From: "Kiely, Timothy" <Kiely.Timothy@epa.gov>
To: Sonia Roussel <Sonia.Roussel@hc-sc.gc.ca>
Date: 02-24-2014 04:04 PM
Subject: Re: Request for an example of seed treatment benefits assessment

Great. Thank you.

From: Sonia Roussel <Sonia.Roussel@hc-sc.gc.ca>
Sent: Monday, February 24, 2014 2:57:59 PM
To: Kiely, Timothy
Cc: Sonia Roussel; Stephen Goodacre
Subject: RE: Request for an example of seed treatment benefits assessment

Hi Tim,

Thank you for the information. I wanted to give you a quick update that I am currently looking into the process for sharing efficacy reviews, as it seems that we have an established process. The lady I was referred to is currently out of the office, I will let you know once I hear back from her.

Sonia

From: "Kiely, Timothy" <Kiely.Timothy@epa.gov>
To: Sonia Roussel <Sonia.Roussel@hc-sc.gc.ca>
Cc: Stephen Goodacre <Stephen.Goodacre@hc-sc.gc.ca>
Date: 02-24-2014 02:29 PM
Subject: RE: Request for an example of seed treatment benefits assessment

Sonia and Stephen,

Hello. I hope you are well. Please see the attached example assessments as we discussed during our meeting. Some are pretty old, but we wanted to give you assessments and information we have for corn. The more recent assessment are more typical of the assessments we complete now. It is not clear to me that all of these went public, so please do not share these documents. Please let me know if you have any questions. Thank you.

Tim

From: Sonia Roussel [<mailto:Sonia.Roussel@hc-sc.gc.ca>]
Sent: Wednesday, February 19, 2014 8:04 PM
To: Kiely, Timothy
Cc: Kiely, Timothy; Sonia Roussel; Stephen Goodacre
Subject: RE: Request for an example of seed treatment benefits assessment

Hi Tim,

Sorry for not responding earlier, I was not at work today. Tomorrow works for us, you can call at my number 613-736-3718

Sonia

Sonia Roussel
Head, Re-Evaluation and Use Analysis Section | Chef, Section de la réévaluation et de l'analyse de l'usage

Value Assessment and Re-Evaluation Management Directorate | Direction de l'évaluation de la valeur et de la gestion des réévaluations
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From: "Kiely, Timothy" <Kiely.Timothy@epa.gov>
To: "Kiely, Timothy" <Kiely.Timothy@epa.gov>, Sonia Roussel <Sonia.Roussel@hc-sc.gc.ca>
Cc: Stephen Goodacre <Stephen.Goodacre@hc-sc.gc.ca>
Date: 2014-02-19 01:04 PM
Subject: RE: Request for an example of seed treatment benefits assessment

Sonia,

Hello. Not sure if you saw my response. Does tomorrow work for you? If so, do you want us to telephone you?
Thanks.

Tim

U.S. EPA
Office of Pesticide Programs
Biological and Economic Analysis Division
Economic Analysis Branch
703-308-8112

From: Kiely, Timothy
Sent: Tuesday, February 18, 2014 4:22 PM
To: 'Sonia Roussel'
Cc: Stephen Goodacre
Subject: RE: Request for an example of seed treatment benefits assessment

Sonia,

Hello. How are you? How about 9 am on Thursday, Feb 20?

Tim

From: Sonia Roussel [<mailto:Sonia.Roussel@hc-sc.gc.ca>]
Sent: Tuesday, February 18, 2014 12:01 PM

To: Kiely, Timothy
Cc: Stephen Goodacre
Subject: Fw: Request for an example of seed treatment benefits assessment

Hi Tim,

I hope all is well with you. I have a favour to ask you. As you may know, Steve is currently working on the value assessment of neonicotinoid insecticides seed treatments. As a result of the report (findings) on bee incidents, the Agency has committed to expedite the re-evaluation of these seed treatments in the context of the pollinators issue. I have attached some links to public documents that were published in the last few months,. Hopefully, they will shed some light in our review.

<http://www.hc-sc.gc.ca/cps-spc/pest/agri-commerce/pollinators-pollinisateurs/index-eng.php>

<http://www.hc-sc.gc.ca/cps-spc/pest/index-eng.php>

<http://www.hc-sc.gc.ca/cps-spc/pubs/pest/fact-fiche/index-eng.php#fs-fr>

http://www.hc-sc.gc.ca/cps-spc/pubs/pest/fact-fiche/pollinator-protection-pollinisateurs/treated_seed-semences_traitees-eng.php

Steve was in touch with you last Summer when we were at the preliminary stage of our assessment, and we are now at the point where it will be helpful for us if we could chat with you, to learn from your experience, on how you conduct benefits and impact assessments. In this particular case, it seems that impact assessments are more line with the economic value assessments that we are conducting for these seed treatments.

I was wondering if you would have some availability to chat either this week or next week. Can you please let me know of your availability on the following dates. Alternatively, you can propose a date that is more suitable for you.

- Thursday, February 20, AM or PM after 2:00
- Friday, February 21, AM or PM after 2:00
- Monday, February 24, AM or PM after 2:30
- Wednesday, February 26, between 9 and 11 AM

Thanks,
Sonia

Sonia Roussel
Head, Re-Evaluation and Use Analysis Section | Chef, Section de la réévaluation et de l'analyse de l'usage
Value Assessment and Re-Evaluation Management Directorate | Direction de l'évaluation de la valeur et de la gestion des réévaluations
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----- Forwarded by Sonia Roussel/HC-SC/GC/CA on 02-18-2014 11:38 AM -----

----- Forwarded by Stephen Goodacre/HC-SC/GC/CA on 2014-02-05 03:04 PM -----

From: "Kiely, Timothy" <Kiely.Timothy@epa.gov>

To: Stephen Goodacre <Stephen.Goodacre@hc-sc.gc.ca>

Date: 2013-07-25 07:18 AM

Subject: RE: Request for an example of seed treatment benefits assessment

Thanks, Steve. I will track down some examples and send them to you. Also, I am still working on the neonic information regarding what we can share.

Tim

U.S. EPA
Office of Pesticide Programs
Biological and Economic Analysis Division
Economic Analysis Branch
703-308-8112

From: Stephen Goodacre [<mailto:Stephen.Goodacre@hc-sc.gc.ca>]
Sent: Wednesday, July 24, 2013 10:02 AM
To: Kiely, Timothy
Cc: sonia.rousseau@hc-sc.gc.ca; Pat Curry
Subject: RE: Request for an example of seed treatment benefits assessment

Hi Tim,

Sorry it took me so long to get back to you. All is well (but very busy) up in the North!

I would indeed still like to get an example of a benefits assessment and an impact assessment (not necessarily for a seed treatment). I noted that the carbofuran and diazinon benefit assessments are no longer on the web (they are now archived). Could I get a copy of those?

We are interested in how BEAD approaches the economic assessments to see if we can implement the same methodology when we do our assessments. The clarification you provided back in June regarding the differences between an impact assessment and a benefit assessment was very helpful.

Working from memory, I recall that the BEAD documents that I have read on the web (I can't recall if they were impact assessments or benefit assessments) contained an assessment at the national industry level and one at the individual grower level.

For the neonicotinoid seed treatments, I did a very high level analysis of the gross and net economic benefits to the corn and soybean industry in Canada.

The gross economic benefit was estimated by looking at the average yield gains from using neonicotinoid seed treatments (from research performed and provided by the Ontario and Québec provincial governments) and the value of soybean and corn seed for 2011.

The net benefit was estimated from the subtracting the seed treatment cost (using proprietary information from Stratus Agri-Marketing) from the estimated gross benefits.

The impacts at the grower level were not estimated as it was clear that pest pressure is the major factor for yield gain from using seed treatments at the field level. It was recognised that the impacts to individual growers could be significant (i.e., net loss in revenue).

The results were presented to the Ontario and Québec provincial governments on July 9, 2013

A copy of the presentation is attached below.

This presentation was previously provided to members of the EPA by Margherita Conti (I don't know who received it though).

It contains Confidential information but we have permission from the data provider (Stratus Agri-Marketing) to share it with the EPA. It should not be circulated outside of the EPA though.

Cheers,

Steve.

From: "Kiely, Timothy" <Kiely.Timothy@epa.gov>
To: Stephen Goodacre <Stephen.Goodacre@hc-sc.gc.ca>
Date: 2013-07-22 08:42 AM
Subject: RE: Request for an example of seed treatment benefits assessment

Stephen,

Hello. I hope you are doing well. How is your analysis going? We had hoped to send you an example of our assessment but have not been able to get it cleared. Are you still interested in seeing ours? Thanks.

Tim

U.S. EPA
Office of Pesticide Programs
Biological and Economic Analysis Division
Economic Analysis Branch
703-308-8112

Subject: Request for an example of seed treatment benefits assessment

Hi Tim,

It has been a long time since we had a chat!

I hope all is well down in Washington.

I was wondering if you had an example of a economic impact assessment for an insecticide seed treatment product that you could share with us.

We would like to look into the economic benefits of seed treatments but have never done an assessment like this before. We are hoping that we could use one of yours to model from.

If you can't provide an example due to confidentiality then any suggestions/recommendations on approaches would be most appreciated!!

Best regards,

Stephen

Senior Scientific Evaluation Officer | Agent d'évaluation principal

Re-evaluation and Use Analysis Section | Section de la réévaluation et de l'analyse de l'usage

Value Assessment Division | Division de l'évaluation de la valeur

Value Assessment and Re-evaluation Management Directorate | Direction de l'évaluation de la valeur et de la pérennité

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PMRA World Wide Web Site: <http://www.hc-sc.gc.ca/cps-spc/pest/index-eng.php> [attachment "terbufos field corn benefits 2000.wpd" deleted by Sonia Roussel/HC-SC/GC/CA] [attachment "Alternatives Assessment for Carbofuran on Field Corn (D328865).pdf" deleted by Sonia Roussel/HC-SC/GC/CA] [attachment "Assessment of the Benefits of Fipronil to Producers of Field Corn (DP # 357367).pdf" deleted by Sonia Roussel/HC-SC/GC/CA] [attachment "Carbaryl Corn Benefit Analysis.pdf" deleted by Sonia Roussel/HC-SC/GC/CA] [attachment "Corn Cluster Impacts 3D Graphics.pdf" deleted by Sonia Roussel/HC-SC/GC/CA] [attachment "FBE_10_wp.doc" deleted by Sonia Roussel/HC-SC/GC/CA] [attachment "tefluthrin.t-test8.wpd" deleted by Sonia Roussel/HC-SC/GC/CA]